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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:	Case No: BKS-23-15490-abl
JAMPA KHAMWONGWAN,	Chapter 13
Debtor.	Hearing Date: OST Requested
	Hearing Time: OST Requested

MOTION FOR CONTINUATION OF AUTOMATIC STAY TO ALL CREDITORS

Come now the Debtor Jampa Khamwongwan (hereinafter "Debtor") and moves this Court pursuant to 11 U.S.C. § 362(c)(3) for an Order continuing the automatic stay provided under § 362(a) as to all creditors, and states:

1. Debtor filed the instant Chapter 13, Case No. 23-15490-abl, December 12, 2023.
2. Debtor previously filed a Chapter 13 Case No.23-10054-abl, which was dismissed October 30, 2023.
3. Pursuant to 11 U.S.C. § 362c(3)(C)(i)(III), Debtor has experienced a substantial change in financial affairs in the following respects:

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- a. Debtor has established a steady source of income from her spouse, and is currently in discussion with the Internal Revenue Service to reduce her outstanding tax debt.

See attached *Declaration of Jampa Khamwongwan*, ¶4.

4. As a result of Debtor's financial circumstances, Debtor has had to file the instant Chapter 13 to reorganize debts. Accordingly, the petition in the instant case was filed in good faith. Debtor believes the Chapter 13 Plan submitted will be confirmed and she will be able to fully perform under the terms of the Plan. *Id.* at ¶5.
5. The Debtor's prior Chapter 13 case 23-10054-abl dismissed on October 30, 2023 was the only prior case by the Debtor pending during the preceding year.

Accordingly, Debtor moves for this Court to continue the automatic stay under 11 U.S.C. § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2) or a motion for relief is granted under § 362(d).

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Or, in the alternative, Debtor moves for this Court to find that all scheduled assets listed in Debtor's Bankruptcy Schedules are property of Debtor's Bankruptcy Estate unless otherwise indicated in those Schedules. And, as a result, any Creditor seeking relief from stay pursuant to 11 U.S.C. § 362 regarding any asset of Debtor's bankruptcy estate must file and serve a written motion as required under F.R.B.P. 9014 and LR 9014. *See Jumpp v. Chase Home Fin., LLC (In re Jumpp)*, 356 B.R. 789 (B.A.P. 1st Cir. 2006).

Debtor further requests LR 9021 be waived in the instant matter.

Dated: December 19, 2023

Nevada Bankruptcy Attorneys, LLC

By: /s/ Matthew Knepper, Esq.

Matthew Knepper, Esq.

NEVADA BANKRUPTCY ATTORNEYS, LLC

Attorney for Debtor

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EXHIBIT: FORM OF ORDER

Matthew Knepper, Esq.
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:	Case No: BKS-23-15490-abl
JAMPA KHAMWONGWAN,	Chapter 13
Debtor.	Hearing Date: OST Requested
	Hearing Time: OST Requested

**ORDER ON DEBTOR'S MOTION FOR CONTINUATION OF
AUTOMATIC STAY TO ALL CREDITORS**

**THE DEBTOR'S MOTION FOR CONTINUATION OF AUTOMATIC STAY TO
ALL CREDITORS** filed by the Debtor, having come on for hearing on the date and time above,
the Court having considered any objections filed or raised at the hearing, it is hereby:

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ORDERED that the stay under 11 U.S.C. § 362(a) shall continue to be imposed as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d) or other Order.

Dated: December 18, 2023

Nevada Bankruptcy Attorneys, LLC

By: /s/ Matthew Knepper, Esq.

Matthew Knepper, Esq.

NEVADA BANKRUPTCY ATTORNEYS, LLC

Attorney for Debtor

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ALTERNATIVE METHOD re: RULE 9021:

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

___ The court has waived the requirement set forth in 9021(b)(1).

___ No party appeared at the hearing or filed an objection to the motion.

___ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

APPROVED:

DISAPPROVED:

FAILED TO RESPOND:

___ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

Submitted by:

Nevada Bankruptcy Attorneys, LLC

By: /s/ Matthew Knepper, Esq.

Matthew Knepper, Esq.

NEVADA BANKRUPTCY ATTORNEYS, LLC

Attorney for Debtor

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